

## REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 10, 2014

ANALYST: Arman David Tarzi

## I. COMMITTEE:

House Majority PAC  
C00495028  
Shannon Roche, Treasurer  
700 13<sup>th</sup> Street, NW  
Suite 600  
Washington, DC 20005

## II. RELEVANT STATUTE:

2 U.S.C. §434(g)(1)  
11 CFR §104.4(c)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)**

House Majority PAC ("the Committee") failed to timely file four (4) 24-Hour Reports to support seven (7) independent expenditures totaling \$67,653.88 disclosed on the Amended 2012 30 Day Post-General Report, received November 5, 2013, made after the 20<sup>th</sup> day but more than 24 hours before the 2012 General Election (Attachment 2).

A Prior Notice listing the official filing dates for monthly filers was sent via email to the Committee on October 1, 2012. The notice included a section titled *48- and 24-Hour Reports on Independent Expenditures*, which read as follows:

"Any PAC or Party Committee that makes independent expenditures in 2012 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure. See 11 CFR 104.4(b)(2) and (c). See generally, 11 CFR 104.4. Web Page: State-by-state chart of 2012 48- and 24-hour periods for independent expenditures [PDF], Campaign

Guide: Nonconnected, pp. 72-74 [PDF]; SSF, pp. 65-67 [PDF]; Party, pp. 87-89 [PDF]. These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate" (Attachment 2).

On December 6, 2012, the Committee filed its 2012 30 Day Post-General Report covering the period from October 18, 2012 to November 26, 2012, which included a Schedule E (Itemized Independent Expenditures) disclosing two-hundred forty-eight (248) independent expenditures totaling \$12,877,023.11, made in support of, or in opposition to, fifty-four (54) federal candidates (Images 12963010723-846).

On December 17, 18, 19 and 21, 2012, the Committee filed Amended 24-Hour Reports to include Independent Expenditures that were not disclosed on the original 24-Hour Reports (Images 12941460730, 12941461854, 12963769798, and 12963777123, Attachment 3).

On January 31, 2013, the Committee filed an Amended 2012 30 Day Post-General Report, which included a Schedule E disclosing two-hundred forty-nine (249) independent expenditures totaling \$12,877,201.82, made in support of, or in opposition to, fifty-four (54) federal candidates. The Committee failed to timely file four (4) required 24-Hour Reports to support seven (7) independent expenditures totaling \$67,653.88 (Images 13960649412-536, Attachment 3).

On July 5, 2013, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2012 30 Day Post-General Report, received January 31, 2013. Among other items, the RAI noted that the Committee may have failed to timely file one (1) or more of the required 24-Hour Reports regarding "last minute" independent expenditures. A chart was included with the RAI identifying the seven (7) independent expenditures, totaling \$67,653.88, for which a 24-Hour Report had not been timely filed (Images 13330034108-10).

On August 9, 2013, the Committee filed a Miscellaneous Electronic Submission ("Form 99") in response to the RAI. The Form 99 stated in part:

"You ask about independent expenditures reported on Schedule E. The Committee received the independent expenditure invoices from the vendors after the 24 hour period. The Committee filed amended 24 hour reports and then disclosed the costs on its Amended 30 Day Post-General Report" (Image 13941323906).

On August 16, 2013, the Reports Analysis Division (RAD) Analyst called Christine Neville, a Committee representative, and informed her that the issues disclosed on the Committee's Amended 2012 30 Day Post-General Report were referable for further action to the Commission. The Analyst stated that if the Committee wanted to provide further clarification on the issue, they could submit additional information for the public record (Attachment 4).

On November 5, 2013, the Committee filed an Amended 2012 30 Day Post-General Report, disclosing no further changes in the amounts on Schedule E (Images 13942253037-161, Attachment 3).

To date, no further communication has been provided by the Committee regarding this matter.

13942253037-161

O-Index

6/10/2014 12:13 PM

O-Index (2013-2014)																
Cmte. ID: C00495028 Cmte. Name: HOUSE MAJORITY PAC																
Treasurer Name: ROCHE, SHANNON Address: 700 13TH STREET, NW SUITE 600, WASHINGTON, DC 20005																
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER																
Form Tp	Rpt Tp	A/I	Receipt Dt	Pgs	Begin Img#	Begin Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debts	Loans	Debts & Loans	
MS-T			1/11/2013	1	13960342833											
MS-T			1/18/2013	1	13960352281											
MS-M			1/31/2013	1	13960858990											
MS-O			2/8/2013	2	13330022360											
MS-T			7/17/2013	1	13964099181											
MS-T			7/17/2013	1	13964099371											
MS-T			7/17/2013	1	13964099372											
MS-T			8/8/2013	1	13964504082											
MS-T			8/9/2013	1	13941323906											
MS-T			10/1/2013	1	13941674544											
MS-M			4/10/2014	1	14960835294											
MS-O			4/16/2014	2	14330048555											
F3XN	12S	N	4/25/2013	104	13962131554	1/1/2013	4/17/2013		\$155,084	\$879,935	\$640,129	\$394,870	\$6,509		\$6,509	
F3XA	12S	A	6/6/2013	105	13940775918	1/1/2013	4/17/2013		\$155,084	\$879,935	\$640,129	\$394,870	\$7,596		\$7,596	
F3XN	30S	N	6/6/2013	97	13940776097	4/18/2013	5/27/2013		\$394,870	\$1,016,973	\$355,438	\$1,056,405	\$6,509		\$6,509	
F3XN	MY	N	7/25/2013	60	13964443997	5/28/2013	6/30/2013		\$1,056,405	\$1,483,126	\$268,530	\$2,251,000	\$6,509		\$6,509	
F3XN	YE	N	1/31/2014	854	14960335564	7/1/2013	12/31/2013		\$2,251,000	\$4,435,231	\$2,310,396	\$4,375,836	\$30,336		\$30,336	
F3XN	12S	N	2/27/2014	107	14940541068	1/1/2014	2/19/2014		\$4,375,836	\$1,022,887	\$1,798,746	\$3,599,876	\$24,597		\$24,597	
F3XA	12S	A	3/7/2014	108	14960489612	1/1/2014	2/19/2014		\$4,375,836	\$1,022,887	\$1,798,746	\$3,599,876	\$24,597		\$24,597	
F3XN	30S	N	4/10/2014	154	14960835091	2/20/2014	3/31/2014		\$3,599,876	\$4,262,862	\$894,644	\$6,968,194	\$1,426		\$1,426	
F3XN	M5	N	5/20/2014	96	14961165608	4/1/2014	4/30/2014		\$6,968,194	\$343,488	\$1,114,660	\$6,197,022			\$0	
F24N	48		1/3/2014	1	14940003358											
F24N	48		1/27/2014	1	14940105055											
F1A		A	1/11/2013	5	13960342850											
F24N	48		1/17/2014	2	14940048889											
F24N	48		2/14/2014	3	14960450982											
F24N	48		2/20/2014	5	14940529526											
F24N	24		2/28/2014	1	14940542377											
F24N	24		3/4/2014	1	14940548585											
F24N	48		2/13/2014	3	14940334944											
F24N	24		2/21/2014	2	14940534011											
F24N	24		2/26/2014	1	14940541023											
F24N	48		4/10/2014	2	14960634254											
F24N	48		3/27/2014	1	14960566263											
F24N	48		4/4/2014	2	14960607509											
F24N	48		4/3/2014	1	14960603399											
F24N	48		3/17/2014	1	14940559048											
F24N	24		3/11/2014	3	14940553698											
F24N	48		3/20/2014	1	14960522776											
F24N	24		3/7/2014	1	14960488564											
F24N	24		3/6/2014	1	14940549906											
F24N	24		5/3/2013	1	13962160133											
F24N	24		4/30/2013	1	13962155376											
F24N	24		4/30/2014	1	14960888126											



F3XA	MY	A	10/12/2011	20	11952551163	6/14/2011	6/30/2011	\$226,946	\$185,000	\$141,156	\$270,790	\$31,537	-	\$31,537
F3XN	30S	N	10/13/2011	45	11971574086	7/1/2011	10/3/2011	\$270,790	\$1,125,000	\$613,890	\$781,900	\$0	-	\$0
F3XA	30S	A	10/31/2011	46	11971778340	7/1/2011	10/3/2011	\$270,790	\$1,125,000	\$613,890	\$781,900	\$378	-	\$378
F3XN	YE	N	1/31/2012	48	12870326884	10/4/2011	12/31/2011	\$781,900	\$910,215	\$519,021	\$1,173,083	\$0	-	\$0
F3XN	Q1	N	4/13/2012	48	12951405667	1/1/2012	3/31/2012	\$1,173,083	\$1,518,393	\$1,027,024	\$1,684,462	\$0	-	\$0
F3XA	Q1	A	11/7/2013	60	13942273388	1/1/2012	3/31/2012	\$1,173,083	\$1,518,393	\$1,027,024	\$1,684,462	\$0	-	\$0
F3XN	12P	N	5/24/2012	41	12951896245	4/1/2012	5/16/2012	\$1,684,462	\$1,126,739	\$863,506	\$1,927,695	\$127,049	-	\$127,049
F3XA	12P	A	7/12/2012	43	12952317183	4/1/2012	5/16/2012	\$1,684,462	\$1,126,739	\$863,506	\$1,927,695	\$133,918	-	\$133,918
F3XN	12S	N	5/31/2012	21	12951932961	5/17/2012	5/23/2012	\$1,927,695	\$225,441	\$229,457	\$1,923,678	\$80,275	-	\$80,275
F3XA	12S	A	7/12/2012	23	12952317515	5/17/2012	5/23/2012	\$1,927,695	\$225,441	\$229,457	\$1,923,678	\$87,144	-	\$87,144
F3XN	30S	N	7/12/2012	74	12952320505	5/24/2012	7/2/2012	\$1,923,678	\$2,938,411	\$785,447	\$4,076,642	\$0	-	\$0
F3XA	30S	A	8/17/2012	75	12952659184	5/24/2012	7/2/2012	\$1,923,678	\$2,938,411	\$785,447	\$4,076,642	\$2,835	-	\$2,835
F3XA	30S	A	10/31/2013	76	13942246541	5/24/2012	7/2/2012	\$1,923,678	\$2,938,411	\$785,447	\$4,076,642	\$2,835	-	\$2,835
F3XA	30S	A	11/1/2013	76	13942248914	5/24/2012	7/2/2012	\$1,923,678	\$2,938,411	\$785,447	\$4,076,642	\$2,835	-	\$2,835
F3XN	M8	N	8/20/2012	38	12952788071	7/3/2012	7/31/2012	\$4,076,642	\$764,580	\$272,086	\$4,569,136	\$12,704	-	\$12,704
F3XN	M9	N	9/20/2012	103	12953145270	8/1/2012	8/31/2012	\$4,569,136	\$5,584,338	\$1,818,291	\$8,335,183	\$24,565	-	\$24,565
F3XA	M9	A	1/31/2013	104	13960642518	8/1/2012	8/31/2012	\$4,569,136	\$5,584,338	\$1,818,291	\$8,335,183	\$24,565	-	\$24,565
F3XN	M10	N	10/20/2012	261	12960658462	9/1/2012	9/30/2012	\$8,335,183	\$5,840,916	\$8,427,306	\$5,748,793	\$9,478	-	\$9,478
F3XA	M10	A	11/5/2013	267	13942252178	9/1/2012	9/30/2012	\$8,335,183	\$5,840,916	\$8,427,306	\$5,748,793	\$9,478	-	\$9,478
F3XN	12G	N	10/25/2012	241	12961205542	10/1/2012	10/17/2012	\$5,748,793	\$6,723,761	\$7,275,673	\$5,196,881	\$32,471	-	\$32,471
F3XA	12G	A	1/31/2013	246	13960645536	10/1/2012	10/17/2012	\$5,748,793	\$6,723,761	\$7,275,673	\$5,196,881	\$32,471	-	\$32,471
F3XA	12G	A	11/1/2013	250	13942248502	10/1/2012	10/17/2012	\$5,748,793	\$6,723,761	\$7,275,673	\$5,196,881	\$32,471	-	\$32,471
F3XN	30G	N	12/6/2012	467	12963010380	10/18/2012	11/26/2012	\$5,196,881	\$8,050,691	\$12,830,200	\$417,372	\$111,676	-	\$111,676
F3XA	30G	A	1/31/2013	479	13960649058	10/18/2012	11/26/2012	\$5,196,881	\$8,050,691	\$12,830,200	\$417,372	\$121,855	-	\$121,855
F3XA	30G	A	11/5/2013	480	13942252682	10/18/2012	11/26/2012	\$5,196,881	\$8,050,691	\$12,830,200	\$417,372	\$111,855	-	\$111,855
F3XN	YE	N	1/31/2013	69	13960656186	11/27/2012	12/31/2012	\$417,372	\$51,463	\$313,770	\$155,064	\$49,527	-	\$49,527
F3XA	YE	A	11/1/2013	69	13942248062	11/27/2012	12/31/2012	\$417,372	\$51,463	\$313,770	\$155,064	\$49,527	-	\$49,527
F1	N		4/8/2011	6	11030591035									
F24N	48		1/27/2012	1	12970156674									
F24N	24		1/20/2012	2	12950176281									
F24N	48		2/17/2012	1	12950536367									
F24N	48		2/10/2012	1	12950504690									
F24N	48		5/4/2012	1	12951590792									
F24	48		4/22/2011	10	11931266096									
F24N	24		5/25/2012	1	12951901094									
F24N	24		5/30/2012	1	12971256261									
F24N	24		6/5/2012	1	12971259525									
F24	24		5/17/2011	1	11931447971									
F24N	24		5/22/2012	1	12951886114									
F24N	48		5/9/2012	1	12951658401									
F24N	24		5/18/2012	2	12951803015									
F24	24		5/20/2011	1	11931502641									
F24N	48		5/11/2012	2	12951666977									
F1A	A		7/1/2012	5	12952312058									
F24	48		6/26/2011	8	11931741514									
F24N	24		8/3/2012	1	12952612539									
F24N	24		8/9/2012	2	12971844923									
F24N	48		8/17/2012	1	12972043218									
F24	48		8/12/2011	3	11932172192									

# ANNOUNCING

6/10/2014 12:13 PM

[illegible]

## O-Index (2009-2010)

Cmte. ID: C00495028 Cmte. Name: HOUSE MAJORITY PAC

Treasurer Name: ROCHE, SHANNON      Address: 700 13TH STREET, NW SUITE 600, WASHINGTON, DC 20005

Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: MONTHLY FILER

Form To	Ref To	A/I	Receipt Dt	Ind	Begin	Img#	Begin	Cva	End	Cva	End	Mail Dt	Begin	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
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No records were found for this cycle.



# GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACs

October 1, 2012

## CURRENT REPORT DUE

### I. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Pre-General <sup>2</sup>	10/01/12 - 10/17/12	10/22/12	10/25/12
Post-General	10/18/12 - 11/26/12	12/06/12	12/06/12

### II. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 17 <sup>3</sup>

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Post-General	10/01/12 - 11/26/12	12/06/12	12/06/12

## REPORTING SCHEDULE FOR REMAINDER OF 2012

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Year-End	11/26/12 - 12/31/12	01/31/13	01/31/13

[Click here for Supplemental Filing Information](#)

<sup>1</sup>A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

<sup>2</sup>Required only if committee makes contributions or expenditures in connection with the general election during the reporting period.

<sup>3</sup>Committees that made general election contributions or expenditures before October 1 and did not previously disclose them must also follow Chart I.

## 2012 SUPPLEMENTAL FILING INFORMATION PACs AND PARTY COMMITTEES

**PLEASE NOTE:** The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

### WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file either quarterly or monthly reports in 2012. See 11 CFR 104.5(c). Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

### METHODS OF FILING REPORTS

#### Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e). See also 11 CFR 104.18 and 100.19.

- Web Page: Electronic Filing Page
- Campaign Guide: *Nonconnected Committees (Nonconnected)*, pp. 51-53 [PDF]; *Corporations and Labor Organizations (SSF)*, pp. 49-51 [PDF]; *Political Party Committees (Party)*, pp. 69-71 [PDF].

#### Paper Filing -- Meeting the Filing Deadline

Paper report filing options -- Registered, Certified or Overnight or First Class Mail. See 11 CFR 104.5(e). See also 11 CFR 100.19.

- Web Page: Link to Paper Forms (for downloading and printing)
- Campaign Guide: *Nonconnected*, pp. 47-48 [PDF]; *SSF*, pp. 45-46 [PDF]; *Party*, p. 65 [PDF].

### CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from monthly to quarterly) who wish to do so must notify the Commission in writing and may change their filing frequency no more than once per calendar year. See 11 CFR 104.5(c).

- Web Page: Filing Frequency by Type of Committee
- Campaign Guide: *Nonconnected*, p. 51 [PDF]; *SSF*, p. 49 [PDF]; *Party*, p. 67 [PDF].

### 2012 REPORTING SCHEDULE

- Web Page: 2012 Reporting Dates Page
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Campaign Guide: *Nonconnected*, pp. 49-51 [PDF]; *SSF*, pp. 46-48 [PDF]; *Party*, pp. 67-68 [PDF].

## PRE-ELECTION REPORTING

Quarterly filing committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: 2012 Congressional Pre-Primary Reporting Dates Page
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Campaign Guide: Nonconnected, pp. 49-51 [PDF]; SSF, pp. 46-48 [PDF]; Party, pp. 67-68 [PDF].

## COMPLIANCE

### Treasurer Responsibility

Committee treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time. See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceeding [PDF]
- Campaign Guide: Nonconnected, pp. 3-4 [PDF]; SSF, pp. 1-2 [PDF]; Party, pp. 6-7 [PDF].

### Administrative Fine Program

Failure to file reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- or non-filers). See 11 CFR 111.43(b). See generally, 11 CFR Part 111 Subpart B. See also 11 CFR 111.43.

- Web Page: Administrative Fine Program Page
- Campaign Guide: Nonconnected, pp. 48-49 [PDF]; SSF, p. 46 [PDF]; Party, p. 66 [PDF].

## DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Party committees and Leadership PACs must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,700 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(f).

- The Record: March 2009 issue [PDF]

## 48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in 2012 may have to disclose this activity within 48- or 24-hours based upon the date and amount of the expenditure.

See 11 CFR 104.4(b)(2) and (c). See generally, 11 CFR 104.4.

- Web Page: State-by-state chart of 2012 48- and 24-hour periods for independent expenditures
- Campaign Guide: Nonconnected, pp. 72-74 [PDF]; SSF, pp. 65-67 [PDF]; Party, pp. 87-89 [PDF].

These reports are not required when a PAC or Party Committee makes a contribution directly to a candidate.

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FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

**House Majority PAC (C00495028)**

2012 Amended 30 Day Post-General Report, received November 5, 2013

**24-Hour Reports Not Timely Filed**

Name of Payee	Date of Expenditure (Schedule E)	Expenditure Amount	Candidate Opposed	Office Sought, State and District	Election	original 24-Hour Report Filed	Amended 24-Hour Report Filed
Waterfront Strategies	10/23/12	\$24,882.35 24-Hour Report Required	Allen B. West	H - FL - 18	2012 General	10/24/12*	12/17/12
Waterfront Strategies	10/25/12	\$29,858.82 24-Hour Report Required	Brian P. Bilbray	H - CA - 52	2012 General	10/26/12*	12/18/12
MITC, LLC	10/29/12	\$3,183.50 24-Hour Report Required	Adam Hasner	H - FL - 22	2012 General	10/30/12*	12/19/12
MITC, LLC	10/29/12	\$3,183.50 24-Hour Report Required	Thomas Latham	H- IA - 3	2012 General	10/30/12*	12/19/12
MITC, LLC	10/29/12	\$3,183.50 24-Hour Report Required	Steve King	H - IA - 4	2012 General	10/30/12*	12/19/12
MITC, LLC	10/29/12	\$3,183.50 24-Hour Report Required	James B. Renacci	H- OH- 16	2012 General	10/30/12*	12/19/12
Waterfront Strategies	11/2/12	\$178.71 24-Hour Report Required	James B. Renacci	H- OH - 16	2012 General	11/2/12*	12/21/12
	<b>TOTAL</b>	<b>\$67,635.88</b>					

\*The original 24-Hour Reports filed by the Committee did not include any of the independent expenditures listed in the above chart.